

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

GLENN C. ELFE

Plaintiff,

v.

Case No.:22-cv-9385(RA)

26 MOTORS CORP.,

KYLE MERRITT,

CHINO GERMINAL LANTIGUA,

JOHN DOE #3 a/k/a MANAGER,

WELLS FARGO BANK, N.A.,

L.J. MARCHESE CHEVROLET, INC., and

MICHELLE BAILEY,

Defendants.

**MOTION FOR ADMISSION *PRO HAC VICE***

Pursuant to Rule 1:3 of the Local Rules of the United States Court for the Southern District of New York, Thomas R. Breeden hereby moves this Court for an Order for admission to practice Pro Hac Vice to appear as counsel for Glenn C. Elfe in the above-captioned action.

1. Applicant's residential address:

Thomas R. Breeden  
101 Smith Heritage Lane  
Boston, Virginia 22713

2. Applicant's office address, telephone number, facsimile number and email address is:

Thomas R. Breeden  
Thomas R. Breeden, P.C.  
10326 Lomond Drive  
Manassas, Virginia 20109  
Telephone No.: (703) 361-9277  
Facsimile No.: (703) 337-0441  
Email: [trb@tbreedenlaw.com](mailto:trb@tbreedenlaw.com)

3. I am in good standing of the bar(s) of the state(s) of and there are no pending disciplinary

proceedings against me in any state or federal court. I have never been convicted of a felony. I have never been suspended disbarred or denied admission or readmission by any court. My firm has been censured by a court, based on an associate's filings in a case.

I have attached the affidavit pursuant to Local Rule 1.3.

- Supreme Court of Virginia (1991);
  - U.S. District Court for the Eastern District of Virginia (1992); and
  - U.S. District Court for the Western District of Virginia (1999).
4. Thomas R. Breeden is in good standing and eligible to practice in all courts to which is admitted, see attached.
5. Local counsel's address, telephone number, facsimile number and email address is:

Brian L. Bromberg  
Bromberg Law Office, P.C.  
352 Rutland Road #1  
Brooklyn, New York 11225  
Telephone No.: (212) 248-7906  
Facsimile No.: (212) 248-7908  
Email: [brian@bromberglawoffice.com](mailto:brian@bromberglawoffice.com)

The required fee of \$200.00 will be submitted.

Dated: Manassas, Virginia  
February 2, 2023

By: /s/Thomas R. Breeden  
One of Plaintiff's Attorneys

Thomas R. Breeden (VSB No. 33410)  
Thomas R. Breeden, P.C.  
10326 Lomond Drive  
Manassas, Virginia 20109  
Telephone No.: (703) 361-9277  
Facsimile No.: (703) 337-0441  
Email: [trb@tbreedenlaw.com](mailto:trb@tbreedenlaw.com)

Brian L. Bromberg  
Bromberg Law Office, P.C.  
352 Rutland Road #1  
Brooklyn, New York 11225  
Telephone No.: (212) 248-7906  
Facsimile No.: (212) 248-7908  
Email: [brian@bromberglawoffice.com](mailto:brian@bromberglawoffice.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on February 2, 2023, a copy of the foregoing Motion for Admission Pro Hac Vice was filed electronically. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

Brian L. Bromberg, Esq.  
Bromberg Law Office, P.C.  
352 Rutland Road #1  
Brooklyn, New York 11225  
Email: [brian@bromberglawoffice.com](mailto:brian@bromberglawoffice.com)

David G. Murphy, Esq.  
Reed Smith LLP  
506 Carnegie Center, Suite 300  
Princeton, NJ 08540  
Email: [dmurphy@reedsmith.com](mailto:dmurphy@reedsmith.com)

Patrick Lyndon Selvey, Jr., Esq.  
H. Nicholas Goodman, Esq.  
Nicholas Goodman & Associates, PLLC  
333 Park Avenue South, Suite 3A  
New York, NY 10010  
Email: [Ngoodman@ngoodmanlaw.com](mailto:Ngoodman@ngoodmanlaw.com)

Dated: February 2, 2023

By: /s/Thomas R. Breeden  
One of Plaintiff's Attorneys  
Thomas R. Breeden (VSB No. 33410)  
Thomas R. Breeden, P.C.  
10326 Lomond Drive  
Manassas, Virginia 20109  
Telephone No.: (703) 361-9277  
Facsimile No.: (703) 337-0441  
Email: [trb@tbreedenlaw.com](mailto:trb@tbreedenlaw.com)